

No. 15-1289

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

NATIONAL LABOR RELATIONS BOARD,	:	
	:	
	:	
Petitioner,	:	
	:	NLRB 05CB114849
v.	:	NLRB 05CB112215
	:	
NATIONAL UNION UNITED SECURITY & POLICE OFFICERS OF AMERICA,	:	
	:	
	:	
Respondent.	:	

**CONSENT MOTION TO EXTEND BRIEFING SCHEDULE**

Respondent, United Security & Police Officers of America (“USPOA”), with the consent of Petitioner and the Court-assigned mediators, respectfully requests that the Court extend the briefing schedule in the above-styled matter for sixty (60) days and as grounds, Respondent states as follows:

1. The Parties agreed to participate in mediation and have engaged in discussions since December 2016. The Parties have significantly narrowed the issues and are working to resolve such issues.
2. Respondent’s brief, (the opening brief in cases filed pursuant to Fed.R.App.P. 15) is due February 29, 2016.

3. The Parties require additional time to conclude discussions and to fashion and execute an appropriate resolution agreement should their final discussions result in settlement.

4. The Parties expect that mediation will conclude on or before April 30, 2016.

5. The National Labor Relations Board and the mediators (Stephen Pollack and William Marmon) consent to the relief requested.

6. The instant motion is the Respondent's second request. Neither Party, however, will be prejudiced by the relief requested.

Accordingly, Respondent respectfully requests that the Court extend the deadline in which to file the opening brief for sixty (60) days, up to and including April 30, 2016.

Respectfully submitted:

February 29, 2016

/s/Eden Brown Gaines

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**CERTIFICATE OF SERVICE**

I do hereby certify that a copy of Consent Motion to Extend Briefing Deadline was served via the Electronic Case Filing System this 29th day of February, 2016 upon the following:

Linda Dreeben  
David Seid  
National Labor Relations Board  
1015 Half Street, SE  
Washington, DC 20570

/s/ Eden Brown Gaines

Eden Brown Gaines